

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
KNOXVILLE DIVISION**

JESSE PIERCE and MICHAEL PIERCE,	)	
on behalf of themselves and all others	)	
similarly situated,	)	CASE NO. 3:13-cv-641
	)	
Plaintiffs,	)	District Judge: Pamela L. Reeves
	)	Magistrate Judge: C. Clifford Shirley, Jr.
vs.	)	
	)	
WYNDHAM VACATION RESORTS,	)	COLLECTIVE ACTION COMPLAINT
INC., and WYNDHAM VACATION	)	FOR VIOLATIONS OF THE FAIR
OWNERSHIP, INC.,	)	LABOR STANDARDS ACT OF 1938
	)	
Defendants.	)	

**PLAINTIFFS' UNOPPOSED MOTION FOR A THREE-DAY EXTENSION TO FILE A  
RESPONSE IN OPPOSITION TO DEFENDANTS'  
MOTION TO STAY DISCOVERY**

Come Plaintiffs and file this Unopposed Motion for a Three-Day Extension to File a Response in Opposition to Defendants' Motion to Stay Discovery.

On July 31, 2015, Defendants filed a Motion to Stay Discovery and supporting Memorandum. *See Docs. 133 and 134.* Plaintiffs' Response in Opposition is due on Friday, August 14, 2015.

Due to a combination of personal issues and the obligations of Plaintiffs' counsel in other matters, it will be difficult for Plaintiffs to file their Response on August 14, 2015, and accordingly, need a three-day extension through Monday, August 17, 2015.

The hearing on Defendants' Motion is currently scheduled on September 15, 2015, so the brief extension of time requested should not result in any prejudice or delay in the disposition of this matter.

Plaintiffs' counsel has consulted with Defendants' counsel, who does not oppose the

requested three-day extension.

Based on the foregoing, Plaintiffs request an order extending the deadline to file their Response in Opposition to Defendants' Motion to Stay Discovery from Friday, August 14, 2015, to Monday, August 17, 2015.

Respectfully submitted,

DICKINSON WRIGHT PLLC

By: /s/ Martin D. Holmes

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*Attorneys for Plaintiffs, Opt-In Plaintiffs and the  
Putative Collective Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 13, 2015, a true and correct copy of the foregoing has been served on the following individuals consenting to electronic service by operation of the Court's electronic filing system:

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